

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

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DECLARATION OF VANESSA BAEHR-JONES

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs Jane Does 1-9 in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. On December 22, 2023, I emailed counsel for Defendants to inquire whether they would agree to a one-week extension of the deadline for Plaintiffs' reply brief in support of their Motion for Leave to Amend (ECF 93).

4. On December 22, 2023, I received an email from counsel for Defendant Johnson City, writing on behalf of all Defendants, stating:

The Defendants are agreeable to your request for a one week extension. However, as a courtesy we ask that you delay service of your subpoena on Mr. Daigle until January 2, 2024 and adjust the time to respond to the subpoena accordingly. I don't know what his schedule is, but I imagine he is taking some time off this week like most of us hopefully are.

5. On December 22, 2023, I responded via email, asking counsel to clarify whether their consent to the extension request was contingent on delayed service of a subpoena to the Daigle Law Group. As of the filing of this declaration, I have not received a response.
6. My law offices are closed this week, the week of December 25, 2023, as are the offices of co-counsel, Heather M. Collins, Elizabeth Kramer, and Kevin Osborne.

This is the 27 day of December 2023.

/s/ Vanessa Baehr-Jones
VANESSA BAEHR-JONES

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on December 27, 2023 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 Email: lisa@hbm-lawfirm.com</p> <p>Emily C. Taylor WATSON, ROACH, BATSON & LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 Email: etaylor@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p>	<p>Daniel H. Rader III Daniel H. Rader IV MOORE, RADER & YORK PC 46 N. Jefferson Avenue P.O. Box 3347 Cookeville, TN 38502-3347 danrader@moorerader.com danny@moorerader.com <i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law <i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 E-mail: kgrant@rswlaw.com <i>Counsel for Justin Jenkins in his individual capacity</i></p>
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/s Heather Moore Collins

Heather Moore Collins